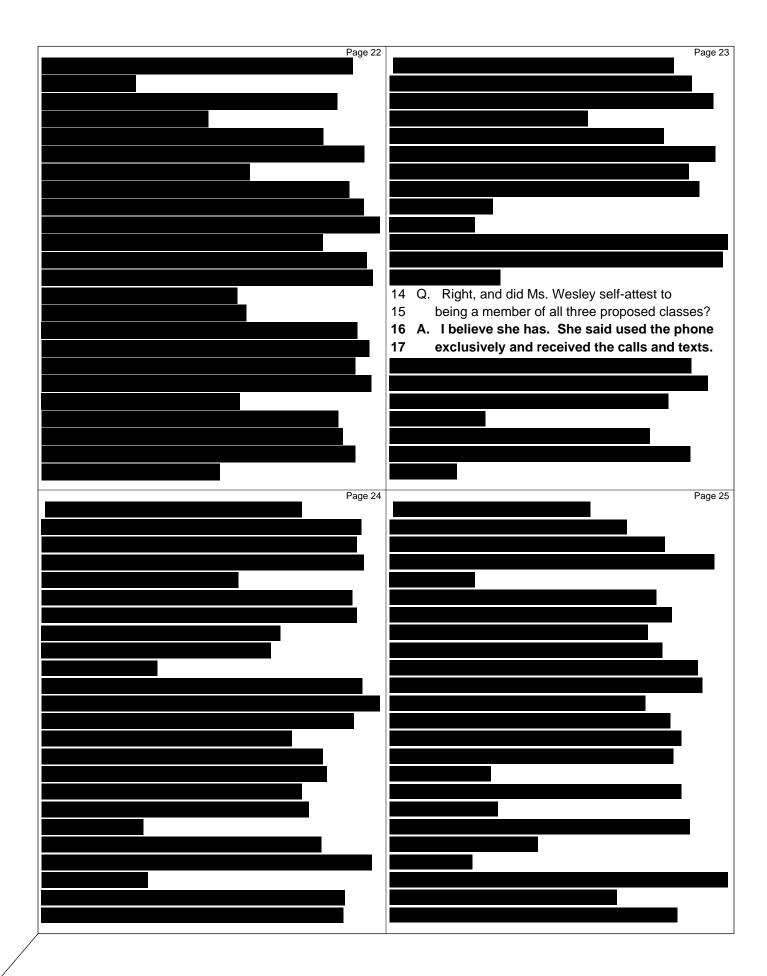
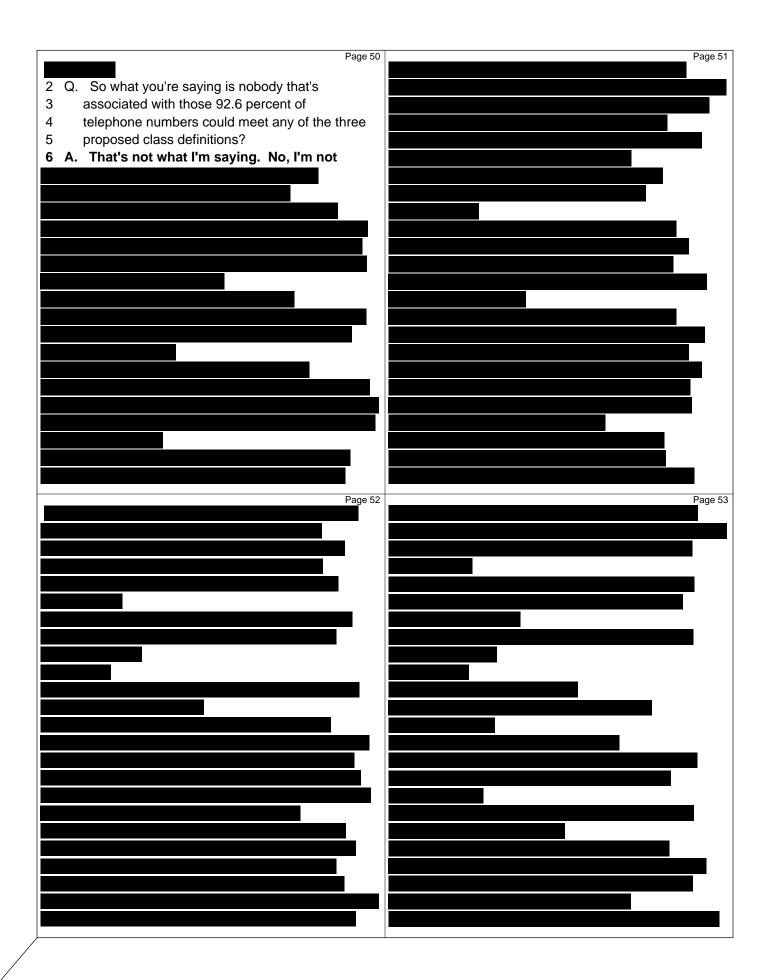
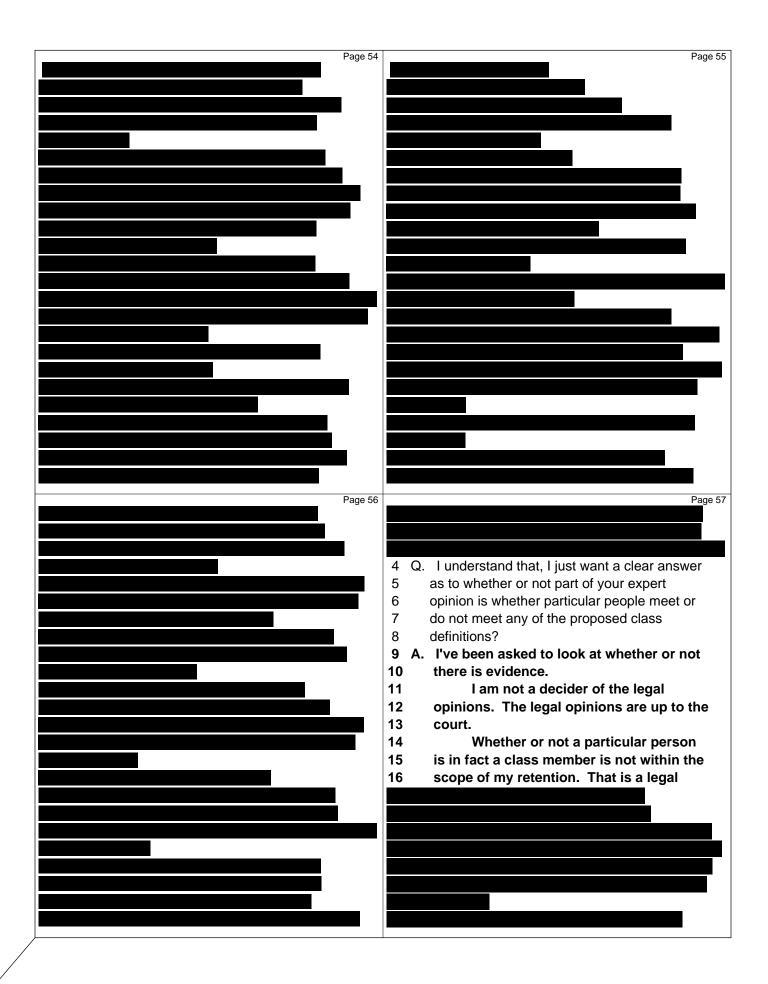
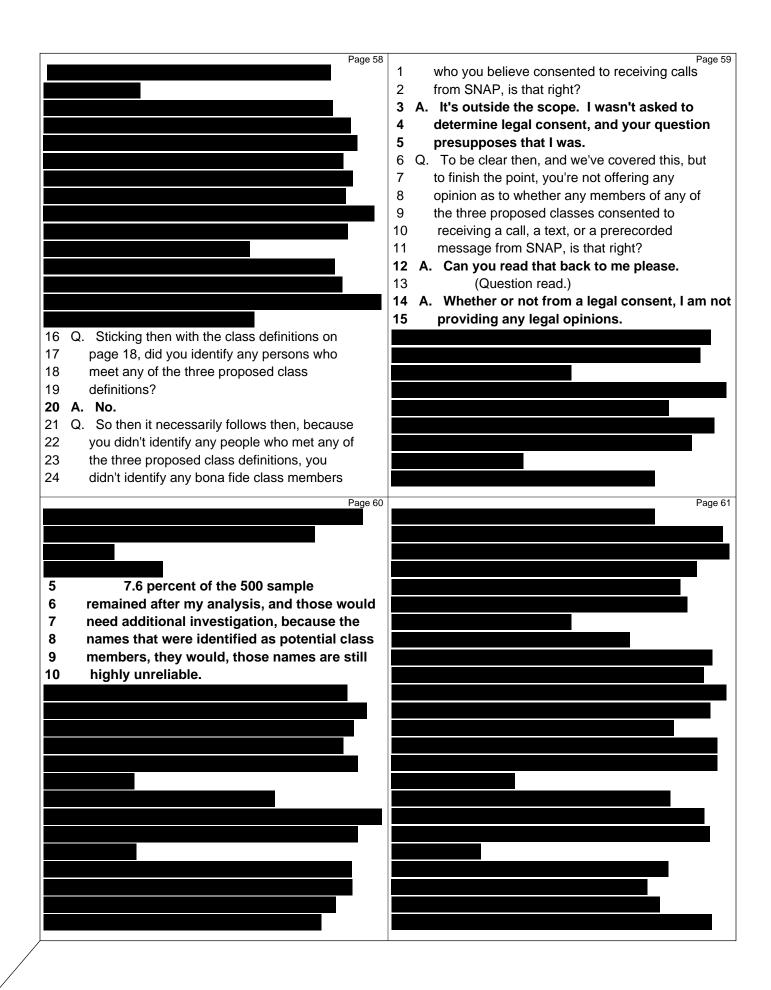
EXHIBIT A

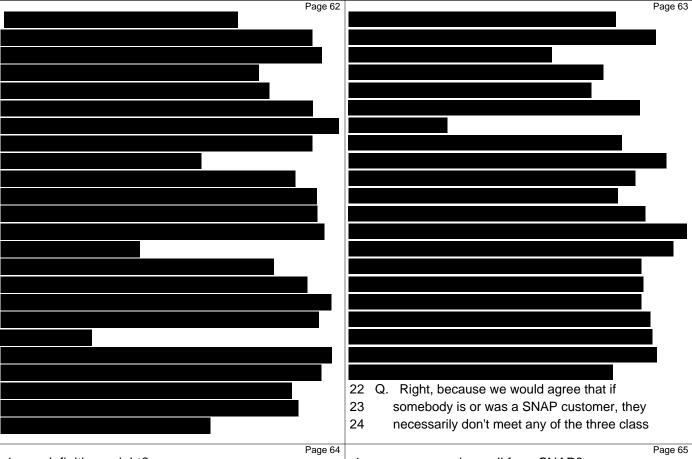
UNITED STATES DISTRICT COURT
DISTRICT OF UTAH
CIVIL ACTION NO. 2:20:CV00148-RJS-JCB
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
BRANDI WESLEY, on behalf of herself and others similarly situated,
Plaintiff,
v.
SNAP FINANCE LLC, Defendant.
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
v.
DERRICK DEON JACKSON, JR., a/k/a DERRICK JOHNSON, Third-Party Defendant
EXPERT WITNESS
ZOOM DEPOSITION OF
MARGARET DALEY
FEBRUARY 18, 2021
1:06 P.M.
Job #32790
REPORTER: TRACY COFFMAN











1 definitions, right?

A. Right, and your very tools are pointing back 2 3 to SNAP customer names.

- 4 Q. Okay, turning to paragraph 43 on page 19, and 5 we addressed this generally.
- 6 A. I'm sorry, can you give me a chance to read 7 it.
- 8 Q. Yeah, I'm bad at that, take as long as you 9 need.

We talked about this generally at

the beginning, in terms of you're not offering an opinion on the publication aspect, but more specifically as it relates to your work in this case, did you issue any kind of press release in an effort to find potential class members?

17 A. No.

10

11

12

13

14

15

16

- 18 Q. Did you establish a website where people who 19 received wrong number calls from SNAP could 20 learn about whether they may be members of
- 21 the proposed classes?
- 22 A. No.
- 23 Q. Did you do any kind of online advertising,
- 24 looking for folks who may have received a

1 wrong number call from SNAP?

2 A. No.

Q. Are you familiar with advertising on 4 Facebook, that it can be directed to

particular telephone numbers?

5

6 A. No.

- 7 Q. So I'm presuming then, in this case, you
- 8 didn't direct any advertising on Facebook to
 - any of the 500 telephone numbers you sampled?
- 10 A. No.

9

- Q. Did you call any of the 500 numbers you 11
- 12 sampled?
- 13 A. No.
- 14 Q. Did you send text messages to any of the 500
- 15 numbers you sampled?
- 16 A. No.
- 17 Q. Did you take any steps to allow potential
- 18 class members to self-identify?
- 19 A. Well, if they wanted to call me, they
- 20 could've. No.
- 21 Q. Did anyone call you?
- 22 A. No.
- 23 Q. All right, let's turn to paragraph 56, which
- 24 is on pages 23 to 24.

